

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

UNITED STATES OF AMERICA)
)
 v.) CR. NO. 3:06cr41-MEF
)
 JUDY ANN BANKS SIMS)

**UNITED STATES' MOTION FOR REDUCTION
FOR ACCEPTANCE OF RESPONSIBILITY**

Comes now the United States of America, by and through Leura G. Canary, United States Attorney for the Middle District of Alabama, and respectfully moves this Court to reduce by one (1) level Defendant's offense level based on Defendant's acceptance of responsibility. As grounds for this Motion, the United States avers as follows:

1. The Defendant notified the United States of Defendant's intent to plead guilty shortly after receiving and reviewing the evidence against him in the form of an Information. The Defendant's prompt notice was sufficiently early to permit the government to avoid preparing for trial and to allocate its resources efficiently. The Defendant pled guilty to the Information on February 9, 2006.
2. Therefore, pursuant to United States Sentencing Guidelines § 3E1.1(b), as amended, the United States makes this formal motion for a one-level reduction in Defendant's offense level for acceptance of responsibility such that the total reduction in offense level for Defendant's acceptance of responsibility shall be three (3) levels, if prior to the adjustment for acceptance of responsibility the offense level is 16 or greater.

WHEREFORE, the United States respectfully requests that this motion be GRANTED.

Respectfully submitted this the 21st day of June, 2006.

LEURA G. CANARY
UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to George L. Beck, Jr., Esquire.

Respectfully submitted,

LEURA G. CANARY
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